

Amendments to the Drawings:

The attached sheet of drawings includes changes to Fig. 2A. This sheet replaces the original Fig. 2A. In Fig. 2A, "Item Type Id" should have been labeled as element 224, instead of 216.

Attachment: Replacement Sheet
Annotated Sheet Showing Changes

REMARKS

At the outset, the Examiner is thanked for the consideration given during the interview of January 23, 2007. By way of summary, the Examiner understood the difference between the “partial” SQL statement of the invention and the use of “entire” SQL statements in *Sadiq et al.* However, the Examiner suggested that even an “entire” SQL statement, when combined with other entire SQL statements, can be embedded within a later final SQL statement. Accordingly, it was suggested that the claims should further distinguish over *Sadiq et al.* in this regard. However, as will be explained below, it is respectfully submitted that *Sadiq et al.* do not teach or suggest combining multiple SQL statements for the purpose of generating a dynamic SQL statement as the Examiner has suggested.

Status of the Claims

By this Amendment, Applicants amend claims 1-6, 9-11 and 20. No further claims have been added or canceled. Claims 1-20 currently remain pending in this application.

Specification

In the Office Action, the Examiner objected to the Title because it appeared to be in need of grammatical correction. It is respectfully submitted that the Title has been amended as requested by the Examiner to recite “Method and Apparatus Using Dynamic SQL for Item Create, Retrieve, Update, or Delete Operations in a Content Management Application”. Withdrawal of the objection to the Title is therefore requested.

In the Office Action, the Examiner has requested capitalization of the trademark "JAVA" wherever it appears. The amendments to the specification reflect this requirement. Accordingly, withdrawal of the objection is requested.

In the Office Action, the Examiner requested that the specification be checked to determine the presence of all possible minor errors. It is respectfully submitted that the specification and been reviewed and amended accordingly. The Applicants have carefully reviewed and where necessary corrected typographical errors and the like; however no new matter has been entered into the application. Entry of the amendments to the specification is respectfully requested.

Drawings

In the Office Action, the Examiner has objected to the drawings as failing to comply with 37 C.F.R. 1.84(p)(5), because reference character "216" has been used to designate both Access Control and Item type ID in FIG. 2A. A corrected replacement drawing sheet of FIG. 2A is submitted herewith in order to overcome the objection to the drawings.

Rejection of Claims 11-20 Under 35 U.S.C. § 112, Second Paragraph

In the Office Action, the Examiner rejected claims 11-20 under 35 U.S.C. § 112, second paragraph, for failing to particularly point out and distinctly claim the invention. This rejection is respectfully traversed.

Responsive to the Examiner's rejection, claim 11 has been amended to correct the antecedent basis of the phrase "said device".

Accordingly, all claims now present in the application are fully definite within the meaning of 35 U.S.C. § 112, second paragraph, and the rejection with respect thereto should be withdrawn.

Rejection of Claims 1-3, 9-11 and 15 Under 35 U.S.C. § 102(b)

Claims 1-3, 9-11 and 15 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,032,153 to *Sadiq et al.* Applicants respectfully traverse this rejection.

Claim 1 is directed to a method of dynamically preparing a structured query language statement, the method comprising, *inter alia*, retrieving a set of attributes based on the type of the item and a partial structured query language statement corresponding to the attributes, and preparing the structured query language statement for the item based on the set of attributes and the partial structured query language statement in response to the request. Claim 9 is directed to an apparatus for dynamically preparing a structured query language statement comprising, *inter alia*, means for retrieving a set of attributes based on the type of the item and a partial structured query language statement corresponding to the attributes, and means for preparing the structured query language statement for the item based on the set of attributes and the partial structured query language statement in response to the request. Claim 10 is directed to a computer readable medium encoded with program code, the medium comprising, *inter alia*, program code for retrieving a set of attributes based on the type of the item and a partial structured query language statement corresponding to the attributes, and program code for preparing the structured query language statement for the item based on the set of attributes and the respective partial structured query language statement in response to the request. Claim 11 is directed to a system that

dynamically prepares a structured query language statement comprising, *inter alia*, a processor configured by a set of program code to determine a partial structured query language statement based on parsing the attributes, and prepare the structured query language statement of the item based on the retrieved attributes and the partial structured query language statement in response to the request.

It is the Examiner's position that *Sadiq et al.* allegedly corresponds to claims 1, 9, 10 and 11 and relies on col. 2, lines 2-6; col. 4, lines 4-27; col. 4, lines 13-15; col. 4, lines 45-50; col. 5, lines 14-21; and col. 6, lines 31-35 thereof.

To the contrary, there is no disclosure, teaching or suggestion in *Sadiq et al.* of retrieving a set of attributes based on the type of the item and a partial structured query language statement corresponding to the attributes. It is clear from Applicants' original specification that "partial" refers to components of the dynamically built SQL statement. In distinction, and contrary to the Examiner's interpretation, *Sadiq et al.* generate an entire SQL statement at the attribute level, and then send the generated SQL statement to the database, referring to at least col. 6, lines 31-40 thereof. Specifically, *Sadiq et al.* state "To dynamically generate an SQL statement, persistence service 48 would traverse data structure 56 and generate one or more SQL statements for each attribute in the data structure. To generate the SQL statement, persistence service 48 may use the attribute name from the data structure, look that attribute name up in the map, and retrieve the record from the map to obtain the information needed to generate the SQL statement. Here a single SQL statement would be generated for all of the attributes in the data structure 56". *Sadiq et al.* therefore do not teach or suggest preparing the structured query language statement for the item based on the set of attributes and the corresponding partial structured query language statements in response to the request.

Accordingly, Applicants respectfully submit that *Sadiq et al.* fail to disclose, teach or suggest the features recited by claims 1-3, 9-11 and 15. Further, Applicants respectfully submit that claims 3 and 15 are in condition for allowance, at least by virtue of their dependency from allowable claims 1 and 11, respectively. Thus, claims 1-3, 9-11 and 15 are patentable over *Sadiq et al.* and the rejection with respect thereto should be withdrawn.

Rejection of Claims 4 and 20 Under 35 U.S.C. § 103(a)

Claims 4 and 20 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,032,153 to *Sadiq et al.* in view of U.S. Patent Publication No. 2003/0093433 to *Seaman et al.* Applicants respectfully traverse this rejection for at least the following reasons.

Claim 4 depends from claim 1 and recites “wherein retrieving the set of attributes and the partial structured query language statement comprises retrieving at least a portion of an insert statement”. Claim 20 depends from claim 11 and recites “wherein the attributes stored in the second table include a structured query language statement that inserts a new item into the first table”.

It is the Examiner’s position that *Sadiq et al.* do not expressly teach the recitations of claim 4 or claim 20 and applies *Seaman et al.* as disclosing these features, referring to paragraph [0144] thereof, in combination with *Sadiq et al.*

To the contrary, *Seaman et al.* fail to overcome the deficiencies described above in connection with *Sadiq et al.* Even further, that portion of *Seaman et al.* identified by the Examiner simply refers to an “insert statement” and does not describe “retrieving at least a portion of an insert statement” as set forth in claim 4. Likewise, there is no comparable teaching

or suggestion of the claim 20 recitation “wherein the attributes stored in the second table include a structured query language statement that inserts a new item into the first table”.

Accordingly, even if combinable, Applicants respectfully submit that *Sadiq et al.* fail to disclose, teach or suggest the features recited by claims 4 and 20, and *Seaman et al.* fail to supply the missing teachings of *Sadiq et al.* Further, Applicants respectfully submit that claims 4 and 20 are in condition for allowance, at least by virtue of their dependency from allowable claims 1 and 11, respectively. Thus, claims 4 and 20 are patentable over *Sadiq et al.* in view of *Seaman et al.* and the rejection with respect thereto should be withdrawn.

Rejection of Claims 5 and 19 Under 35 U.S.C. § 103(a)

Claims 5 and 19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,032,153 to *Sadiq et al.* in view of U.S. Patent No. 5,950,188 to *Wildermuth*. Applicants respectfully traverse this rejection for at least the following reasons.

Claim 5 depends from claim 1 and recites “wherein retrieving the set of attributes and the partial structured query language statement comprises retrieving information that indicates access rights for the structured query language statement”. Claim 19 depends from claim 11 and recites “wherein the attributes stored in the second table includes information indicating access rights for each type of item”.

It is the Examiner’s position that *Sadiq et al.* do not expressly teach the recitations of claim 4 or claim 20 and applies *Wildermuth* as disclosing these features, referring to col. 7, lines 1-21 and cols. 7-8, lines 61-3 thereof, in combination with *Sadiq et al.*

To the contrary, *Wildermuth* fail to overcome the deficiencies described above in connection with *Sadiq et al.* Instead, access rights in *Wildermuth* are with respect to

distinguishing an internal system command from a suitably-privileged user rather than the claimed access rights for the structured query language statement.

Even if combinable, Applicants respectfully submit that *Sadiq et al.* fail to teach or suggest the features recited by claims 5 and 19 and *Wildermuth* fails to supply the missing teachings of *Sadiq et al.* Further, Applicants respectfully submit that claims 5 and 19 are in condition for allowance, at least by virtue of their dependency from allowable claims 1 and 11, respectively. Thus, claims 5 and 19 are patentable over *Sadiq et al.* in view of *Wildermuth* and the rejection with respect thereto should be withdrawn.

Rejection of Claims 6 and 12-14 Under 35 U.S.C. § 103(a)

Claims 6 and 12-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,032,153 to *Sadiq et al.* in view of U.S. Patent No. 6,219,676 to *Reiner*. Applicants respectfully traverse this rejection for at least the following reasons.

Claim 6 depends from claim 1 and recites “wherein retrieving the set of attributes and the partial structured query language statement comprises: determining a timestamp for the set of attributes and the partial structured query language statement; and selectively retrieving the set of attributes and the partial structured query language statement from a cache based on the timestamp”. Claims 12-14 depend from claim 11 and are directed to a cache that stores a copy of at least a portion of the second table; wherein the second table includes a timestamp for each row in the second table; and wherein the processor is configured to selectively retrieve information for the cache or the second table based on the timestamp, respectively.

It is the Examiner's position that *Sadiq et al.* do not expressly teach the recitations of claims 6 and 12-14, and applies *Reiner* as disclosing these features, referring to col. 7, lines 43-64 and col. 9, lines 27-45 thereof.

As previously described, *Sadiq et al.* fail to disclose, teach or suggest the invention as claimed by claim 6. Moreover, *Reiner* fails to overcome the deficiencies described above in connection with *Sadiq et al.* Even further, *Reiner* does not specifically teach the second table, that the timestamp is for each row in the second table, or that the processor selectively retrieves information for the cache or the second table based on the timestamp. Instead, *Reiner* is directed to creating an updated log when content is added, changed or deleted, the update being in the form of a time stamp located in a designated area of memory accessible to the cache server. Thus there is no teaching or suggestion of the claimed elements identified above, specifically the partial structured language query.

Even if combinable, Applicants respectfully submit that *Sadiq et al.* fail to teach the features recited by claims 6 and 12-14 and *Reiner* fails to supply the missing teachings of *Sadiq et al.* Further, Applicants respectfully submit that claims 6 and 12-14 are in condition for allowance, at least by virtue of their dependency from allowable claims 1 and 11, respectively. Thus, claims 6 and 12-14 are patentable over *Sadiq et al.* in view of *Reiner* and the rejection with respect thereto should be withdrawn.

Rejection of Claims 7, 8 and 16-18 Under 35 U.S.C. § 103(a)

Claims 7, 8 and 16-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,032,153 to *Sadiq et al.* in view of U.S. Patent No. 5,742,806 to *Reiner et al.* Applicants respectfully traverse this rejection for at least the following reasons.

Claim 7 depends from claim 1 and recites “wherein preparing the structured query language statement comprises opening a first set of cursors for the structured query language statement”. Claim 8 depends from claim 7 and recites “further comprising opening a second set of cursors when all of the cursors in the first set have been opened”. Claim 16 depends from claim 15 and recites “further comprising a set of files that include a plurality of cursors for the embedded structured query language statements”. Claim 17 depends from claim 16 and recites “wherein the set of files comprise a first package of cursors that are opened by the embedded structured query language statements”. Claim 18 depends from claim 17 and recites “wherein the set of files further comprises a second package of cursors that are opened by the embedded structured query language statements when all of the cursors in the first package have been opened”.

It is the Examiner’s position that *Sadiq et al.* do not expressly teach the limitations of claims 7, 8 and 16-18, and applies *Reiner et al.* as disclosing these features, referring to cols. 89-90, lines 65-5 thereof.

To the contrary, that portion of *Reiner et al.* referred to by the Examiner fails to indicate that a second package of cursors is opened by embedded structured query language statements when all of the cursors in the first package have been opened. Instead, *Reiner et al.* simply allocate a cursor for the original query and cursors for the corresponding subqueries. No sequence of operating is described therein.

Even if combinable, Applicants respectfully submit that *Sadiq et al.* fail to teach the features recited by claims 7, 8 and 16-18 and *Reiner et al.* fail to supply the missing teachings of *Sadiq et al.* Further, Applicants respectfully submit that claims 7, 8; and 16-18 are in condition for allowance, at least by virtue of their dependency from allowable claims 1 and 11,

respectively. Thus, claims 7, 8 and 16-18 are patentable over *Sadiq et al.* in view of *Reiner et al.* and the rejection with respect thereto should be withdrawn.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 50-2961.

Respectfully submitted,

Dated: January 24, 2007

By: Barbara A. Fisher

Barbara A. Fisher
Reg. No. 31, 906

for: Donald Min
Reg. No. 47,796

MH2 Technology Law Group
Tel: 703.917.0000

ANNOTATED SHEET

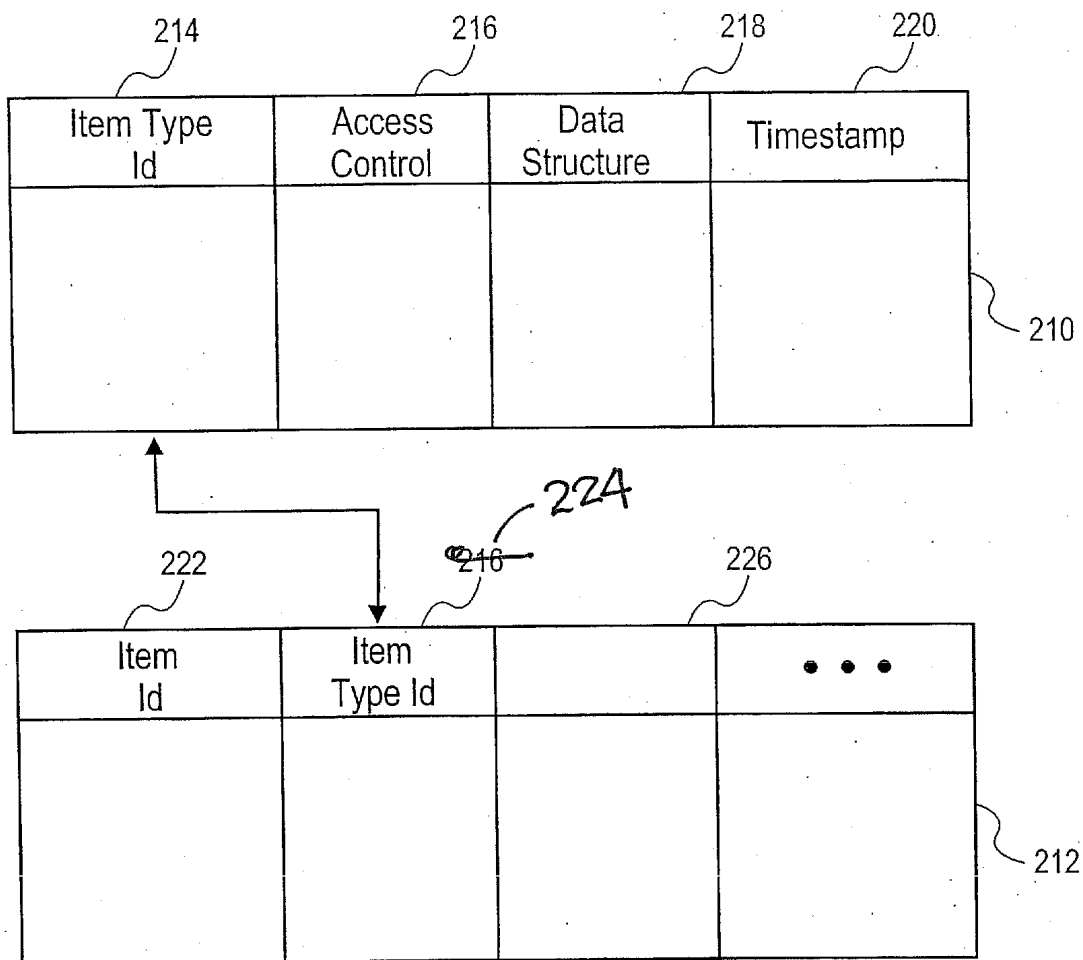


FIG. 2A